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David L. McCorkle, Treasurer Pennsylvania Food PAC (PA Food PAC) 1029 Mumma Road Wormleysburg, PA 17043

JUN 1 5 1999

Identification Number: C00345660

Reference:

Statement of Organization dated 5/25/99

Dear Mr. McCorkle:

This letter is prompted by the Commission's preliminary review of your Statement of Organization. The review raised questions concerning certain information contained in the Statement. An itemization follows:

-Please clarify your relationship with Pennsylvania Food Merchants Association and the Pennsylvania Convenience Store Council, which you have indicated as "Principal". Line 6 of the Statement of Organization form is reserved for listing either connected organizations or affiliated committees.

Line 6 lists two organizations which appear to be possible connected organizations, yet Line 5(f) states that your committee is <u>not</u> a separate segregated fund. A separate segregated fund is a political committee established, financed, maintained or controlled by a corporation, labor organization, membership organization, cooperative or trade association.

If your committee is a separate segregated fund, an amended Statement of Organization should be submitted which indicates the appropriate Type of Committee on Line 5(e) and the name of, your relationship with (i.e. "Connected") and type of, connected organization, on Line 6. Moreover, in accordance with 2 U.S.C §432(e)(5), the name of any segregated fund is required to include the full name of its connected organization. This

includes any abbreviation within its title.

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If your committee is not a separate segregated fund, then you should <u>not</u> have listed any organization on Line 6, and should amend your Statement of Organization to clarify this discrepancy, by indicating "None" on Line 6. 2 U.S.C. §433(b) and 11CFR §102.2(b).

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,

Dominick Ciaraldi

Reports Analyst

Reports Analysis Division

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